

STATE OF MISSOURI       )  
  ) ss  
COUNTY OF JACKSON    )

**AFFIDAVIT**

I, Justin Lewis, being duly sworn, state as follows:

**AGENT INTRODUCTION AND BACKGROUND**

1.       I am a United States Postal Inspector with the United States Postal Inspection Service, and have been so employed since August, 2002. I am currently assigned to the Kansas City Field Office of the Postal Inspection Service and have experience enforcing federal mail and drug laws. This affidavit is based on my own personal knowledge and information given to me by other Postal Inspectors and other law enforcement personnel.

2.       I received basic training for approximately 12 weeks from the United States Postal Inspection Service regarding individuals using the United States Mail to transport controlled substances and proceeds from the sale of controlled substances as well as the use of Postal Money Orders to launder the proceeds of controlled substances. I received formal training for one week in March 2003, when I attended the United States Postal Inspection Service Narcotics training course in San Diego, California. This training involved narcotics investigation techniques, chemical field testing, and training in the identification and detection of controlled substances and narcotics proceeds being transported in the United States mail and other commercial carriers. As a United States Postal Inspector, I have been involved in over 150 illegal narcotics investigations involving the United States Mail and have been identified by the U.S. Postal Inspection Service as a Subject Matter Expert (SME) in narcotics cases involving the United States mail. I currently serve as an instructor at the United States Postal Inspection Service Narcotics training course.

3. The U. S. Postal Inspection Service has implemented a parcel profile program targeting parcels mailed to and from areas of the United States which have been identified by law enforcement as being source areas for the distribution of controlled substances. The Kansas City Field Office Postal Inspection Service program consists of reviewing postal service records and a physical profile of Express and Priority Mail parcels and envelopes which have originated from and/or have been received for delivery in the District of Kansas and Western District of Missouri.

#### **ITEM TO BE SEARCHED AND ITEMS TO BE SEIZED**

4. This affidavit is made in support of an application for a search warrant for a United States Postal Service (“USPS”) Express Mail Parcel, bearing tracking number “EK162588417US,” addressed to “Sandy Jones, 4215 Spruce St., Kansas City, MO 64130,” with a return address of “Curtis Jones, 4647 W. 17th St., L.a Ca 90018,” mailed on February 3, 2014, from Los Angeles, California 90008. Further, this parcel weighs approximately 6 pounds 10.4 ounces and bears \$63.65 in postage (“Subject Parcel”).

5. Items to be seized from the Subject Parcel include controlled substances: specifically marijuana, cocaine, methamphetamine and heroin; any drug paraphernalia related to the possession or distribution of a controlled substance including narcotic packaging.

6. The Subject Parcel is currently located within the Western District of Missouri, specifically the U.S. Postal Service Express Mail Unit, located at 300 West Pershing Road, Kansas City, Missouri.

#### **OFFENSES UNDER INVESTIGATION**

7. Based upon my training and experience and on the facts set forth in this Affidavit, I believe there is probable cause to believe that the Subject Parcel contains evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Section 1956 (money laundering

and conspiracy); Title 21, United States Code, Section 841(a)(1) (distribution of and possession with intent to distribute a controlled substance); Title 21, United States Code, Section 846 (attempts and conspiracies to do the same); and Section 843(b) (unlawful use of a communications facility to facilitate the commission of the above narcotics offenses).

### **PROBABLE CAUSE**

8. On February 4, 2014, while at the Postal Service's Express Mail Unit, located at 300 West Pershing Road, Kansas City, Missouri, I observed an Express Mail parcel, bearing tracking number "EK162588417US," addressed to "Sandy Jones, 4215 Spruce St., Kansas City, MO 64130," with a return address of "Curtis Jones, 4647 W. 17th St., L.a Ca 90018," mailed on February 3, 2014, from Los Angeles, California 90008. Further, this parcel weighs approximately 6 pounds 10.4 ounces and bears \$63.65 in postage ("Subject Parcel").

9. Postal Inspection Service personnel researched Postal Service records and learned the following:

a. The Subject Parcel was mailed around 2:33 p.m., on February 3, 2014, from the Los Angeles, California Post Office 90008. The Subject Parcel weighs approximately 6 pounds 10.4 ounces and bears \$63.65 in postage and has a scheduled delivery by 3:00 p.m., on February 4, 2014.

b. The return address on the Subject Parcel, "Curtis Jones, 4647 W. 17th St., L.a Ca 90018," is a valid address, but Curtis Jones was not identified as being associated to the address.

c. The name on the delivery address, Sandy Jones, was not found to be associated to the delivery address of 4215 Spruce St., Kansas City, Missouri 64130.

10. Based on my training and experience I know there are common characteristics used by individuals who traffic in illegal controlled substances via the U.S. Mail. The Subject Parcel contained several of these characteristics including:

- a. The Subject Parcel has a handwritten label;
- b. The Subject Parcel was mailed from a known illegal drug source distribution area (i.e., California);
- c. The sender waived the recipient signature requirement;
- d. The sender used a fictitious name on the return address; and
- e. The recipient's name on the Subject Parcel is not associated to the delivery address.

11. Kansas City, Missouri Police Detective Antonio Garcia was present at the Kansas City, Missouri Express Mail Unit when the Subject Parcel was identified. The Subject Parcel was placed in an area containing various postal service boxes and other items. Detective Garcia retrieved his narcotic detection canine "Zina" and I observed Zina searching the room. Zina walked by the Subject Parcel and stopped. Detective Garcia said that Zina had alerted to the Subject Parcel as containing a narcotic odor. "Assuming that the dog is reliable, a dog sniff resulting in an alert on a container, car, or other item, standing alone, gives an officer probable cause to believe that there are drugs present." *United States v. Bowman*, 660 F.3d 338, 345 (8th Cir. 2011).

12. According to Officer Garcia, Zina is a three-year-old, female German Shepherd. Zina was first trained as a narcotics detection dog by Vohne Liche Kennels in Denver, IN. Vohne Liche Kennels is authorized trainer #5000-80 for the Indiana Law Enforcement Training Academy. Zina was first certified by the National Police Canine Associate in September 2012. Zina is trained to detect the odors of cocaine, marijuana, heroin, and methamphetamine. Zina was last certified by the Kansas City, Missouri Police Department in September 2013. Since

being certified, Zina has recovered 1,534 pounds of marijuana, 48.8 pounds of cocaine, 33.7 pounds of methamphetamine, 18.4 pounds of heroin, and \$736,840.00 in United States currency.

### CONCLUSION

13. Therefore, based on these facts, I respectfully submit that there is probable cause to believe that the Subject Parcel contains evidence, fruits, and instrumentalities in violation of Title 18, United States Code, Section 1956 (money laundering); in violation of Title 21, United States Code, Section 841(a)(1) (distribution of and possession with intent to distribute a controlled substance); in violation of Title 21, United States Code, Section 846 (attempts and conspiracies to do the same); and in violation of Title 21, United States Code, Section 843(b) (unlawful use of a communications facility to facilitate the commission of the above narcotics offenses).

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
JUSTIN LEWIS  
United States Postal Inspector  
United States Postal Inspection Service

Subscribed and sworn to before me

this 6th day of February 2014.

  
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HONORABLE SARAH W. HAYS  
Chief United States Magistrate Judge  
Western District of Missouri

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